

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

July 7, 1997

SUBJECT: Site 6 Removal

FROM: Darius Ostrauskas

TO: Navy/NORTHDIV

Based on a review of a letter from Brown and Root dated July 1, 1997, and a teleconference call on July 3, 1997, EPA provides the following recommendations:

Pit 6A

Based on available data, this excavation can be backfilled.

Trench TR6E

Based on the detection of benzo(a)pyrene at levels above cleanup criteria established by the Navy at sample locations -14 and -15 within the layer of discoloration/waste in the western wall, additional material from this layer should be removed and these 2 locations resampled for PAHs and PCBs. As discussed, while the Navy believes that the detected benzo(a)pyrene may be attributable to apparent asphalt in or above the subject layer, there is no data to confirm this conclusion. In this case, the layer of material should be further removed. As discussed, it is recommended that all of the remaining layer be removed before further sampling is performed. In addition, as discussed, the Navy should consider excavating the layer of concern and then only down to a depth where previous sampling indicates no exceedance of cleanup criteria. If there is no existing data to document this depth and the Navy chooses not to excavate to the bottom of the existing pit (i.e., about ten feet), at least one sample should be collected (and analyzed for PAHs and PCBs) at the new depth of excavation to confirm the excavation is of sufficient depth to remove soil above cleanup criteria.

Pit 6F

Based on previous samples -13 and -14, it is recommended that the stain-like feature in the south wall be fully removed and the location then be resampled for PCBs and chromium (one sample).

Based on previous sample -20, the trash layer appearing in the south wall should be removed and this location resampled for lead. In addition, it is noted that this layer extends into the west wall. The material in the west wall should also be removed and this location sampled for lead (unless previous data indicates no exceedances at this location). Similarly, based on previous sample -21, the stain-like feature in the north wall should be removed and the location resampled (1 sample) for chromium.

As with the layer of waste in TR6E, consider excavating to a depth slightly below the layer and/or stain-like feature of concern. If this approach is taken, a sample should be collected below each location to confirm the depth of excavation is adequate to remove soil above cleanup criteria.